

# Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • [emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

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October 22, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Cheryl L. Pollak, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13B South  
Brooklyn, NY 11201-1804

**Re: Ortega v. Champagne Room BK, Inc., et al.**  
**Case No.: 1:21-cv-1125 (NGG) (CLP)**

Dear Judge Pollak:

This office represents the Plaintiff Iluminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes consistent with this Court’s October 10, 2024 Order, to inform the court of the status of the bankruptcy proceeding.

As set forth in an interim trustee’s motion for sanctions against Champagne Room BK, Inc. (“CRBK”) and its counsel, a prior bankruptcy petition bearing Case No.: 22-40705 was filed on April 4, 2022 and dismissed on November 18, 2022 for failure to file schedules. See ECF Docket Entry [13](#) at ¶ 1. The subsequent bankruptcy petition was also dismissed, on CRBK’s own motion, after the interim trustee moved for sanctions because “[t]he Trustee believes this case was filed with no intention of following through with a Chapter 7 Case, this is a clear sign of some type of delay tactic, or filing only for the purpose to receive Bankruptcy relief. This is a clear sign of bad faith filing on behalf of the [CRBK] and counsel Victor M. Feraru.” Id. at ¶ 11. CRBK’s counsel moved to withdraw from this case, and was terminated on December 20, 2023. See ECF Docket Entry [77](#) and Text Only Order dated December 20, 2023.

Based on the foregoing, there is no stay in effect as to CRBK pursuant to 11 U.S.C. § 362. Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
October 22, 2024

Respectfully submitted,  
**SAGE LEGAL LLC**  
/s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

*Attorneys for Plaintiff*  
*Ortega Iluminada*

**VIA FIRST CLASS MAIL**

Sarkis Avoyants  
233 Avenue W  
Brooklyn, NY 11223

**VIA ECF**

All counsel of record